

## REMARKS

This is in response to the Office Action mailed March 6, 2008. In the Office Action, claims 1-3, 5, 7-24, 26, 28, and 31-34 were pending and rejected. With this Amendment, claims 1, 9, 11-15, 17, 18, 20 and 26 are amended; claim 8 is cancelled; and the remaining claims are unchanged in the application.

Section Three of the Office Action indicated that the specification was objected to under 37 C.F.R. § 1.75 because the specification allegedly did not provide antecedent basis for the phrase “user-configurable” in claim 20. Applicants have amended independent claim 20 to recite, in place of “user-configurable” --customizable--. Additionally, Applicants respectfully submit that the specification provides abundant antecedent basis for this term as set forth, at least, on page 24, lines 23-28.

Section Four of the Office Action indicated that claim 26 was objected to under 37 C.F.R. § 1.75(c) as being in improper form because it depends from a cancelled claim. In response, Applicants have amended dependent claim 26 to depend from amended independent claim 20. Accordingly, Applicants respectfully submit that amended claim 26 is now in compliance with 37 C.F.R. § 1.75(c). Applicants respectfully submit that the objections to the claims may now be withdrawn.

Section Six of the Office Action indicated that independent claim 1, among others, was rejected under 35 U.S.C. § 103(a) as being unpatentable over Warshavsky et al. (U.S. Pat. No. 6,732,095 – hereinafter “Warshavsky”) in view of Pryce et al. (U.S. Pat. No. 7,257,597 – hereinafter “Pryce”). As an initial matter, Applicants respectfully note that independent claim 1 has been amended to recite the subject matter previously set forth in dependent claim 8, which is now cancelled. Further, Applicants respectfully note that the subject matter of dependent claim 8 was rejected in the same section of the Office Action under the Warshavsky/Pryce combination. Applicants respectfully submit that Warshavsky, in fact, does not teach or suggest the subject matter which the Office Action alleges with respect to amended independent claim 1.

Amended independent claim 1 recites:

A method of migrating business data from a source system to an extensible destination system, the method comprising:

examining a structural definition of the extensible destination system and synchronizing a structure of an intermediate database system with the extensible destination

system, wherein the intermediate database system includes an entity extension table and an entity base table;  
collecting source data from the source system and populating the synchronized intermediate database system with source data; and  
migrating the source data from the intermediate database system to the extensible destination system according to migration overhead information.

Applicants respectfully note that the title of this patent application is “Business Data Migration Using Metadata.” (emphasis added) Further, amended independent claim 1 recites, in both the preamble and the body of the claim, migrating data. Applicants also respectfully note that the word migration is not found in the entire Warshavsky reference. Instead, the Warshavsky reference is directed simply to a method and apparatus for mapping between XML and relational representations. Essentially, the issue then becomes how reasonable is it to stretch and characterize the Warshavsky in order to meet the terms of the amended independent claim 1. Applicants respectfully submit, in view of the following, that the construction is simply too tortured and convoluted to be reasonable.

Section Six of the Office Action asserted that Warshavsky teaches a method of migrating business data from a source system to an extensible destination system in column 4, lines 65-66. However, that cited text simply provides, “an XML converter 116 maps the set of relational data to an XML document 104 using the set of XML mapping definitions 114 constructed for a particular application.” There is no indication that the mapping recited in that portion is migration of business data. However, Warshavsky also provides, “the relational data is transferred between a first computer system 106 and a second computer system 108, where each computer system 106 and 108 might be managed by a different company.” Column 4, lines 39-42. Accordingly, the mapping of XML documents and relational database(s) is likely an expedient for conducting business-to-business electronic interchanges of data in a standardized format in order to facilitate e-commerce.

The next feature of independent claim 1, “examining a structural definition of the extensible destination system” was asserted by the Office Action to be met by column 3, lines 40-45 of Warshavsky where an XML mapping definition of the XML system consists of three entities: object, component, and field. Accordingly, it appears that it is the position of the Office

Action that the XML system of Warshavsky is to be considered the extensible destination system of independent claim 1. Thus, the XML mapping definition would be equated to examining the structural definition of the extensible destination system. Given that position of the Office Action, it is essentially asserting that examining a structural definition of the extensible destination system means the XML mapping definition is examined. It is also noted that Warshavsky provides two different types of conversions: conversion from an XML document to relational data, as described on column 7, lines 43-58; and conversion from relational data to an XML format, as described on column 8, lines 30-37. The XML mapping definition is that definition that allows conversion between the two. Thus, examining the XML mapping definition of Warshavsky is not specific to either the source, or the destination system. It is simply a mapping between an XML document and relational database(s). This construction only survives if the entire extensible destination system of independent claim 1 can be considered to be equivalent to an XML document.

The next feature of amended independent claim 1 that the Office Action asserted was met by Warshavsky is, “synchronizing a structure of an intermediate database system with the extensible destination system.” In this regard, the Office Action asserted that XML converter 116 maps the set of relational data to an XML document 104 using the set of XML mapping definitions constructed for particular application. (Citing column 4, lines 65-67) Applicants respectfully submit that this statement is erroneous on at least three fronts. First, the relational database of Warshavsky cannot fairly be considered to be the intermediate database system of independent claim 1. At best, the relational database system of Warshavsky would be considered source data. Second, as set forth above, the extensible destination system of independent claim 1 is also not equivalent to an XML document. Third, and most important, even if the intermediate database system of independent claim 1 were equivalent to the relational database of Warshavsky, nowhere in the teaching of Warshavsky is the actual structure of the relational database changed or otherwise modified to be synchronized to the XML document.

The next feature of independent claim 1 that the Office Action alleged to be met by Warshavsky is, “populating the synchronized intermediate database system with the source data.” The Office Action asserted that storing business data in a relational database in the Warshavsky reference meets this limitation. However, as set forth above, Applicants

respectfully submit nowhere in the Warshavsky reference is the relational database structure modified, adjusted or otherwise synchronized in any way, shape or form. Thus, there is no synchronized intermediate database to populate source data to.

Still another feature of independent claim 1 asserted by the Office Action to be met by Warshavsky is, "collecting source data from the source system." The Office Action asserted that column 1, lines 58-67 and column 2, lines 1-5 of Warshavsky provide this feature. However, column 1, lines 58-67 merely indicates that most business data is stored at some point in a relational database. Further, column 2, lines 1-5 merely indicates that XML is frequently used to pass business data between applications or partner companies, while the relational data model is used for the internal storage of the same data. Applicants respectfully submit that it is inconsistent for the Office Action to assert that the presence of data in a relational database meets the limitation of collecting source data from the source system while simultaneously meeting the limitation of populating the intermediate database system with the source data. The question then becomes, is the relational database of Warshavsky the source system, or the intermediate database system? It is only when all of the above-discussed differences between the XML-relational mapping of Warshavsky and the method of migrating business data of independent claim 1 are ignored that the Warshavsky reference even appears relevant to amended independent claim 1.

Notwithstanding all of the strained constructions of the Warshavsky reference discussed above, page Four of the Office Action finally concedes that Warshavsky (set forth at Earshavsky) does not teach the limitations wherein the intermediate database system includes an entity extension table and an entity base table. The Office Action then turns to its secondary reference (Pryce) and finds a pair of tables: legacy base table and legacy child table. The Office Action then asserts, "Pryce teaches the legacy system has legacy base table (fig. 8, col. 2, lines 55-60). Legacy child table is inserted a new record (fig. 8). Legacy child is represented as extensible table." Respectfully, there is no indication by the Office Action how the legacy base and child tables of Pryce meet the limitations of an entity extension table and an entity base table. Further, the reasoning providing by the Office Action for the combination of Pryce with Warshavsky is erroneous. Specifically, the Office Action provides, "It would have been obvious to a person of an ordinary skill in the art at the time the invention was made to apply Pryce's

teaching of the legacy system has legacy base table and child table to Abrams's system in order to transfer data from old system to a new system quickly and further allow users to extend tables in a relational database for storing values or definitions of associated with new attributes in the attribute table." Not only is the proposed combination supported by the nebulous advantage of "quick" and "extendable," but the reasoning relies upon the Abrams' system which does not appear to be relevant to the Warshavsky/Pryce combination. Accordingly, Applicants respectfully submit that the combination of Warshavsky with Pryce is improper. Further, Applicants respectfully submit that even if the Warshavsky and Pryce references could be properly combined, that the combination fails to reach the subject matter of amended independent claim 1. Thus, Applicants respectfully submit that amended independent claim 1 is allowable over Warshavsky and Pryce, taken alone or in combination.

Independent claim 20 was rejected in Section Twelve of the Office Action as being rejected under over 35 U.S.C. § 103(a) as being unpatentable over Warshavsky in view of Cabrera et al. (U.S. Pat. No. 6,269,382 – hereinafter "Cabrera"). Applicants have amended independent claim 20 to address the concerns set forth in Section Three of the Office Action regarding antecedent basis for "user-configurable." Accordingly, amended claim 20 now recites that the migration overhead information is customizable. However, Applicants have also amended independent claim 20 in order to broaden that claim such that the migration overhead information merely includes information about which entities are to be migrated. Thus, the additional limitations of "which attributes will be migrated, and migration order" have been removed. Applicants respectfully submit Warshavsky fails as the primary reference with respect to amended independent claim 20 for the same reasons set forth above with respect to independent claim 1. Accordingly, Applicants respectfully submit that even if Warshavsky and Cabrera can be combined, that the combination fails to address the subject matter of amended independent claim 20.


In conclusion, Applicants respectfully submit that amended independent claims 1 and 20 are allowable over the art of record. Further, Applicants respectfully submit that dependent claims 2, 3, 5, 7, 9-19, 21-24, 26, 28, and 31-34 are allowable as well by virtue of their dependency, either directly or indirectly, from allowable independent claims. Thus,

Applicants respectfully submit that the entire application is in condition for allowance. Reconsideration and favorable action are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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